

# ARS □ ERS □ NASS □ NIFA

## *Policies and Procedures*

**Title:** Acquisition and Property Management Reviews

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**This Replaces:** 210.1-ARS dated 03/30/2012

**Distribution:** ARS Headquarters, Business Service Centers, and Locations

This P&P sets forth the requirement to conduct Acquisition and Property Management Reviews (APMR) on a regular basis, in accordance with USDA regulations such as AGAR 401.601(a).

This P&P has been updated to reflect APD's new role in performing non-BSC Acquisition Management Reviews.

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## **1. Introduction**

It is the responsibility of the Research, Education, and Economics' (REE), Head of the Contracting Activity Designee (HCAD) (Director, APD) to ensure compliance with all applicable regulations, policies, and procedures for procurement and property activities. To ensure compliance, the Acquisition Programs and Oversight Branch (APOB), Property and Support Services Branch (PSSB) and Business Service Center (BSC), Acquisition Branches, and Facilities, Property, and Safety (FPS) Branches, will periodically conduct Acquisition Management Reviews (AMR) and Property Management Reviews (PMR).

The review objectives are to: 1) determine compliance with procurement and property statutes, regulations, and related USDA, REE or Agricultural Research Service (ARS) policy issuances; 2) determine where APD can clarify policies and procedures; and 3) identify best practices to share with other acquisition and property personnel throughout ARS.

## **2. Policy**

In accordance with the authority set forth in the Agriculture Acquisition Regulations (AGAR) 401.601(a), and Agriculture Property Management Regulations (AGPMR) 110-50.103 (personal property), 110-34.5 (fleet), and Department Regulation 5400-006, Use of the Fleet Card, APD will conduct AMRs and PMRs of the acquisition and property functions within the Business Service Centers (BSC) on a rotating basis. Likewise, the BSC's will conduct reviews of the non-BSC Contracting Officers and property management officers (PMOs) in the Areas under their purview.

The AMRs will cover services, supplies, construction and architect-engineer (A-E) contracts, simplified acquisition procedures, blanket purchase agreements, purchase card and convenience check transactions, and as needed interviews with the procurement staff.

The PMRs will cover personal property acquisitions, inventories, transfers, disposals, vehicle management, fleet credit card oversight, and interviews with the personal property staff, as needed.

APD will also review the staffing and oversight functions of the procurement and property offices.

All AMRs and PMRs will be conducted virtually therefore, it may be necessary to physically send files to the reviewing office. However, when available, electronic files are preferred. All shipping costs related to the AMRs and PMRs will be paid by the reviewing office.

## **3. Acquisition Management Reviews**

## **I. BSC AMR Review Procedures**

Prior to the review, APD will issue a memo that outlines the AMR objectives, and requests specific review documentation (e.g. files, logs, etc.) (see Exhibits 1 – AMR Procedures Chart and 2 – AMR Review Data). APOB will identify AMR team leads and team members.

The BSC will forward the required review data and any questions to the AMR team lead. All documentation must be received by the AMR team lead by the required due date.

The AMR team will conduct the review in accordance with the AMR checklists (e.g., contracts, simplified acquisition procedures, purchase card and convenience check, property/fleet management). The checklists will be kept current and in accordance with the Federal Acquisition Regulations (FAR) and AGAR. Using the respective checklists, each AMR team member will identify findings documenting noncompliance with statutes, regulations, and USDA, REE and ARS policy documents.

The APD Director will transmit the final report documenting findings of noncompliance to the BSC Director. The BSCs shall provide proposed corrective action (see Exhibit 4) based on the findings to the AMR Team Lead for review and approval. Upon APD approval of the proposed corrective action, the BSC shall submit quarterly progress reports to the AMR Team Lead until all issues are resolved.

The BSC Director or designee is responsible for implementing all corrective action and submitting quarterly progress reports documenting accomplishments to the Team Lead for closure.

## **II. Non-BSC AMR Review Procedures**

APD will review at least 10% of the selected non-BSC Contracting Officers (CO) actions on a rotational basis. If a high number of deficiencies, errors, omissions, etc., are found additional files may be reviewed. All reviews will follow similar procedures as outlined below and will be conducted using the checklists found on the APD web site.

Reviews will investigate whether the requirements of laws, executive orders, regulations, and other applicable Agency policies and procedures, including clearances and approvals, have been met; that the CO has not signed “for” or over the name of another Contracting Officer; that the CO did not sign contracts, including modifications, options, estimated orders against an indefinite delivery contract, or any other agreement, that will result in the total amount of the contract or order exceeding the limitations of their warrant; determine if all necessary actions for effective contracting, including compliance with the terms of the contract, and safeguarding the interests of the Agricultural Research Service (ARS) and the United States

were conducted; that sufficient funds were available for obligation; all procurement documents were signed by the appropriate individuals; that contractors received impartial, fair, and equitable treatment; compliance with regulations, policies and procedures concerning small business were met; that contracts have been properly closed-out in accordance with Federal, USDA, and ARS policies; etc.

APD will create an AMR report (similar to Exhibit 5) documenting detailed findings, recommendations, and required corrective actions with specific due dates-where appropriate, and send it to the location Administrative Officer (AO) and the head of the location (i.e. Research Leader (RL), Center Director (CD), etc.), for review.

### **III. Summary of Responsibilities**

#### **BSC Reviews**

##### **APD Team Lead**

- Coordinates the planning, scheduling, and review.
- Reviews, documents, and consolidates findings and submits a detailed report of findings and recommendations to the APD Director.
- Reviews quarterly progress reports from BSC on implementation of recommendations and corrective action until all issues are resolved.

##### **APD Team Members**

- Conducts the review of contracts, simplified acquisition procedures, blanket purchase agreements, and purchase card and convenience check transactions and composes the subsequent report.
- Composes a report of findings for incorporation into the AMR draft report and submits to Team Lead.
- Develops and keeps current the checklists for contracts, simplified acquisition procedures, blanket purchase agreements, and purchase card and convenience check, etc., in accordance with the FAR, AGAR, and related policy documents.

##### **BSC Acquisition Branch Chiefs / Business Service Center Directors**

- Provides required review data (Exhibit 2) and any questions to the AMR Team Lead.
- Reviews the AMR report, provides proposed corrective action to APD based on the findings, and implements corrective action for closure.

- Monitors progress on implementation of corrective action and submits quarterly reports to the AMR Team Lead until all issues are resolved.

### **APD Director**

- Issues the final AMR reports.
- Monitors progress on implementation of corrective action

### **Non-BSC Reviews**

#### **Non-BSC Contracting Officers**

- Provides required review data and any questions to APD.
- Reviews the AMR report, implementing corrective action and recommendations for closure.
- Submits quarterly progress reports on implementation of corrective actions to APD until all issues are resolved.

### **APD**

- Coordinates the planning, scheduling, and review of non-BSC Contracting Officers.
- Reviews, documents, and consolidates findings and submits a detailed report of findings and recommendations to the location Research Leader.
- Monitors progress on implementation of recommendations and corrective action until all issues are resolved.

## **4. Property Management Reviews**

### **I. BSC PMR Review Procedures**

Prior to the review, APD will issue a memo that outlines the PMR objectives, and requests specific review documentation (e.g. files, logs, etc.) (see Exhibits 6 – PMR Procedures Chart and 7 – PMR Review Data). PSSB will identify PMR team leads and team members.

The BSC will forward the required review data and any questions to the PMR team lead. All documentation must be received by the PPMR team leads by the required due date.

The PMR team will conduct the review in accordance with the PMR checklists (e.g., property/fleet management). The checklists will be kept current and in accordance with the, AGPMR and Federal Management Regulations (FMR). Using the respective checklists, each PMR team member will identify findings documenting noncompliance with statutes, regulations, and USDA, REE and ARS policy documents.

The APD Director will transmit the final report documenting findings of noncompliance to the BSC Director. The BSCs shall provide proposed corrective action (see Exhibit 9) based on the findings to the PMR Team Lead for review and approval. Upon APD approval of the proposed corrective action, the BSC shall submit quarterly progress reports to the PMR Team Lead until all issues are resolved.

The BSC Director is responsible for implementing all corrective action and submitting quarterly progress reports documenting accomplishments to the Team Lead for closure.

### **II. Non-BSC PMR Review Procedures**

The BSC FPS Branch Chiefs shall review at least 1/3 of the non-BSC PMOs in the Areas under their purview annually on a 3-year rotational basis. Reviews will ensure that the location PMO has proper supporting documentation for disposals; the PMO has copies of physical inventories with supporting documentation and signatures; PMOs screened excess through various systems, including when using donation programs, documentation for fleet services that exceed \$3,000, use of vehicle logs and retention of receipts, etc.

The BSC FPS Chief shall create a PMR draft report (similar to Exhibit 10) documenting detailed findings, recommendations, and required corrective actions with specific due dates, where appropriate and send to APD, PSSB, for review. Upon completion of PSSB's review of the draft report the BSC Branch Chief will draft a final report which incorporates PSSB's comments and transmit it to the location Administrative Officer (AO), the head of the location (i.e. Research Leader (RL), Center Director (CD), etc.), and APD Director.

### **III. Summary of Responsibilities**

#### **PSSB Team Lead**

- Coordinates the planning, scheduling, and review.
- Reviews, documents, and consolidates findings and submits a detailed report of findings and recommendations to the APD Director and PSSB Chief.
- Reviews quarterly progress reports from BSC on implementation of recommendations and corrective action until all issues are resolved.

#### **PSSB Team Members**

- Conducts PMR for personal property/fleet management.
- Provides all necessary assistance required by the BSC FPS Branch Chiefs.
- Composes a report of findings for incorporation into the PPMR draft report and submits to Team Lead.
- Develops and keeps current the checklists for property in accordance with the AGPMR, FMR, and related policy documents.

#### **BSC FPS Branch Chiefs / Business Service Center Directors (BSC Reviews)**

- Provides required review data (Exhibit 7) and any questions to the PMR Team Lead.
- Reviews the PMR report, provides proposed corrective action to APD based on the findings, and implements corrective action for closure.
- Monitors progress on implementation of corrective action and submits quarterly reports to the PMR Team Lead until all issues are resolved.

#### **APD Director**

- Issues the final PMR report.  
Monitors progress on implementation of corrective action.



### **BSC FPS Branch Chiefs (Non-BSC Reviews)**

- Coordinates the planning, scheduling, and review of non-BSC PMOs in the Areas under their purview.
- Reviews, documents, and consolidates findings and submits a detailed report of finding and recommendations to the location Research Leader and APD Director.  
Monitors progress on implementation of recommendations and corrective action until all issues are resolved.

Michael L. Barnes  
Director, Acquisition and Property Division

## Exhibit 1

### AMR PROCEDURES CHART

| Action to be completed   |
|--|
| APD will forward a memo to the BSC requesting specific review documentation (e.g. organizational charts, files, logs, etc.) (See Exhibit 2, AMR Review Data.)                              |
| The office scheduled for review will forward the required data to the AMR Team Lead by the required due date.  |
| The AMR Team will conduct the review in accordance with the AMR checklists and document findings.  |
| The AMR Team Leads shall prepare the draft AMR report. (See Exhibit 3 for report outline.)   |
| The APD Director will review the draft AMR report and provide comments.  |
| APD Director will transmit the final report to the BSC Director.   |
| The BSC Director will implement corrective action to resolve the AMR findings. The BSC Director will submit quarterly reports to the respective AMR Team Lead until all issues are closed. |

## **Exhibit 2**

### **AMR REVIEW DATA**

The BSC will supply the following data to APD prior to the AMR.

1. Chart showing how the Procurement and Property staffs fit within its organizational structure.
2. Acquisition Staffing Chart listing each individual's name, series, grade, title and delegation of contracting authority.
3. Procurement files selected for review.

## **Exhibit 3**

### **BSC Review - Acquisition Management Review Report Outline**

#### **I. INTRODUCTION**

1. APD Team
2. BSC
  - A. Identify Staff
  - B. Summary of Procurement Actions
3. Percentage of the Review

#### **II. Findings**

1. Contracts - Supplies/Services
2. Contracts – Construction
3. Simplified Acquisition Procedures
4. Blanket Purchase Agreements
5. Purchase Card/Convenience Check

#### **III. EXHIBITS**

## Exhibit 4

### **BSC Review – BSC Proposed Corrective Actions**

#### I. INTRODUCTION

#### II. FINDINGS AND CORRECTIVE ACTIONS

Finding –

Corrective Action -

Finding –

Corrective Action -

Finding –

Corrective Action -

Finding –

Corrective Action -

## **Exhibit 5**

### **Non - BSC Review - Acquisition Management Review Report Outline**

#### **I. INTRODUCTION**

1. AMR Team
2. Location
  - A. Identify Staff
  - B. Summary of Procurement Actions
3. Percentage of the Review

#### **II. PROCUREMENT**

1. Findings and Recommendations

#### **III. EXHIBITS**

## Exhibit 6

### PMR PROCEDURES CHART

| Action to be completed   |
|--|
| APD will forward a memo to the BSC requesting specific review documentation (e.g. organizational charts, files, logs, etc.) (See Exhibit 7, PMR Review Data.)                              |
| The office scheduled for review will forward the required data to the PMR Team Lead by the required due date.  |
| The PMR Team will conduct the review in accordance with the PMR checklists and document findings.  |
| The PMR Team Lead shall prepare the draft PMR report. (See Exhibit 8 for report outline.)  |
| The APD Director will review the draft PMR report and provide comments.  |
| APD Director will transmit the final report to the BSC Director.   |
| The BSC Director will implement corrective action to resolve the PMR findings. The BSC Director will submit quarterly reports to the respective PMR Team Lead until all issues are closed. |

## **Exhibit 7**

### **PMR REVIEW DATA**

For property, the BSC will supply the following data to APD prior to the PMR.

1. Organizational chart listing the individuals name, title, and functional responsibilities.
2. A list of accountable property officer names/numbers that the BSC serves as the PMO.
3. A list of vehicle tag numbers that is directly under the BSC's control

Prior to the PMR, the Review Team will identify specific APO files, vehicle files, use logs, receipts, and any copies of location property/fleet oversight reviews for review by the PMR Team. For accountable property, the PMR team will use the PROP 303 Transaction Report to verify that the files contain documentation that corresponds to the transaction report. For non-accountable property, the PMR team will review available files to determine the percentage for review.



## **Exhibit 8**

### **BSC Review - Property Management Review Report Outline**

#### **I. INTRODUCTION**

- 1.APD Team
- 2.BSC- Identify Staff
- 3.Percentage of the Review

#### **II. Findings and Recommendations**

1. Staffing
2. Reference Materials
3. Accountability
4. Property Records
5. Inventory Control
6. Suspense Report
7. Excess Property
8. Disposal
9. Motor Vehicles
10. Fleet Credit Cards
11. Summary of Property Findings

#### **III. EXHIBITS**

**BSC Review – BSC Proposed Corrective Actions**

**I. INTRODUCTION**

**II. FINDINGS AND CORRECTIVE ACTIONS**

Finding –

Corrective Action -

Finding –

Corrective Action -

Finding –

Corrective Action -

Finding –

Corrective Action -

## **Exhibit 10**

### **Non - BSC Review - Property Management Review Report Outline**

#### **I. INTRODUCTION**

1. BSC Team
2. Location - Identify Staff
3. Percentage of the Review

#### **II. Findings and Recommendations**

1. Staffing
2. Reference Materials
3. Accountability
4. Property Records
5. Inventory Control
6. Suspense Report
7. Excess Property
8. Disposal
9. Motor Vehicles
10. Fleet Credit Cards
11. Summary of Property Findings

#### **III. EXHIBITS**